

REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-31 are currently pending. No claims have been amended herewith.

In the outstanding Office Action, Claims 1-27 were rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential elements.

Applicants wish to thank the Examiner for the interview granted Applicants' representative on September 7, 2005, at which time the outstanding rejection of the claims was discussed. At the conclusion of the interview, the Examiner indicated that the outstanding rejections of the claims under 35 U.S.C. § 112 would be withdrawn in response to a formal response to the outstanding Office Action.

Claim 1 is directed to a method for coding a signal frame at a transmitter using a Karhunen-Loeve Transform (KLT), comprising the steps of: (1) estimating KLT basis vectors of the signal frame; (2) calculating KLT coefficients of the signal frame; and (3) transmitting at least one of the KLT coefficients, but not the KLT basis vectors, to a receiver.

Applicants respectfully traverse the rejection of Claim 1 (and dependent Claims 2-14) under 35 U.S.C. § 112, second paragraph, for being incomplete for omitting essential elements. As discussed in the interview, Claim 1 is directed to a method for coding a signal frame at a transmitter. Thus, contrary to the assertion on pages 3 and 4 of the outstanding Office Action, Claim 1 does not require a positive recitation of what occurs at the receiver, e.g., estimation of the KLT basis vectors. As shown in a non-limiting example in Figure 2C, the basis vectors are estimated at both the transmitter and the receiver. Accordingly, the KLT basis vectors do not need to be transmitted to the receiver, and there is no omission in Claim 1, which is directed to a coding method at the transmitter, regarding the calculation of the

CLT coefficients. As stated in Rodime PLC v. Seagate Technology Inc.,¹ "[a] claim need not claim every function of a working device. Rather, a claim may specify improvements in one function without claiming the entire machine with its many functions." Accordingly, Applicants respectfully traverse the rejection of Claim 1 (and dependent Claims 2-14) as being incomplete for omitting essential elements.

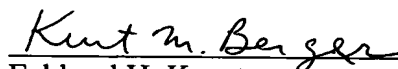
Independent Claims 15, 16, and 29-31 recite limitations analogous to the limitations recited in Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully traverse the rejections of Claims 15-31 under 35 U.S.C. § 112.

Thus, it is respectfully submitted that independent Claims 1, 15, 16, and 29-31 (and all associated dependent claims) satisfy the requirements of 35 U.S.C. § 112.

Consequently, in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Eckhard H. Kuesters
Attorney of Record
Registration No. 28,870
Kurt M. Berger, Ph.D.
Registration No. 51,461

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)
EHK/KMB:aif

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¹ 50 USPQ2d 1429, 1435 (Fed. Cir. 1999) (holding that the district court erred by importing the functions of a working device into the claims, rather than reading the claims for their meaning independent of any working embodiment).